

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2019-130-E / 2019-51-E / 2018-401-E

IN RE:	)	
	)	
Ecoplexus Inc.	)	
	)	
Complainant,	)	<b>THIRD CONSENT MOTION TO EXTEND DEADLINES</b>
	)	
v.	)	
	)	
	)	
Dominion Energy South Carolina, Inc.	)	
(f/k/a South Carolina Electric & Gas Company),	)	
	)	
Defendant.	)	

Pursuant to Commission Rule 103-829 and -831, Ecoplexus Inc. (“Ecoplexus”) and Dominion Energy South Carolina (f/k/a South Carolina Electric & Gas Company)(“DESC”) hereby submit this Third Consent Motion to Extend Deadlines to postpone all dates in the schedule issued in this matter by the Standing Hearing Officer Directive dated June 2, 2020 and all discovery in this matter for thirty (30) days to allow the parties to continue with ongoing settlement discussions and to provide further flexibility to respond to the protracted disruption to business and legal matters resulting from the COVID-19 pandemic.

The original schedule in this matter was set by the Standing Hearing Officer Directive dated March 9, 2020. On Consent Motion to Extend Deadlines of the parties dated April 9, 2020, the Commission extended that schedule by 45 days in the Standing Hearing Officer Directive dated April 9, 2020. Pursuant to a Second Consent Motion to Extend Deadlines dated May 22, 2020, the Commission further extended the schedule by an additional 45 days to allow for ongoing efforts

to explore a negotiated resolution of the matter. Following the Second Motion, the Standing Hearing Directive of June 2, 2020, Order No. 2020-44-H, was issued, which provided the following current schedule:

July 6, 2020	Discovery to resume
July 20, 2020	Ecoplexus' Responses to DESC's First Set of Discovery Requests
August 12, 2020	Oral arguments regarding Motion to Dismiss
August 17, 2020	Discovery process ends
August 31, 2020	Ecoplexus prefile direct testimony
September 14, 2020	Other parties' testimony
September 21, 2020	Ecoplexus rebuttal testimony
September 28, 2020	Other parties' surrebuttal testimony
October 15, 2020	Hearing to be rescheduled by the Commission not before this date

As previously indicated, the parties continue to progress with meaningful settlement discussions and would like a modest additional extension of time to attempt to work through what are complex potential settlement matters. Moreover, the parties continue to diligently work through and explore these complex issues despite still working remotely in many instances and with limited staff and resources due to the COVID-19 pandemic response. Among other impacts, both parties are still materially hindered in conducting or responding to discovery and in adequately preparing for all other matters currently scheduled by the Standing Hearing Officer Directive. Accordingly, the parties request an additional thirty (30) day extension for all dates in the presently controlling Standing Hearing Officer Directive and a hold on all discovery, including responses currently due, for the same thirty (30) days. The parties believe that the requested 30-day extension is reasonable under the current circumstances and there is good cause for the same.

Moreover, as the matter is by consent, the parties acknowledge that there is no prejudice as a result of the requested thirty (30) day extension. Both parties further stipulate and agree not to serve or otherwise conduct any discovery in this matter until the 30-day extension ends on August 5, 2020.

Accordingly, based on the foregoing, the parties propose and move for the following revised schedule as follows:

August 5, 2020	Discovery to resume
August 19, 2020	Ecoplexus' Responses to DESC's First Set of Discovery Requests
September 11, 2020	Oral arguments regarding Motion to Dismiss
September 16, 2020	Discovery process ends
September 30, 2020	Ecoplexus prefile direct testimony
October 14, 2020	Other parties' testimony
October 21, 2020	Ecoplexus rebuttal testimony
October 28, 2020	Other parties' surrebuttal testimony
November 16, 2020	Hearing to be rescheduled by the Commission not before this date

For the aforementioned reasons, Ecoplexus and DESC respectfully request that the Commission grant this Motion in its entirety.

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**WE SO MOVE AND CONSENT:**

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Dated: July 9, 2020

- and -

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